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April 11, 1988

Mary A. Gade, Acting Chief
Emergency and Remedial Response Branch
U.S. Environmental Protection Agency, Region 5
230 South Dearborn Street
Chicago, Illinois 60604

Re: Request for Information Regarding Sanitary Landfill Company Site,
Moraine, Ohio

Dear Ms. Gade:

This letter acknowledges receipt on March 14, 1988 by Kimberly-Clark Corporation's ("Kimberly-Clark" or "the Corporation") Karolton Envelope Division ("Karolton") of the Environmental Protection Agency's ("EPA" or "the Agency") letter requesting information concerning Karolton's possible use of the Sanitary Landfill Company site in Moraine, Ohio ("the Site").¹

A comprehensive review of Karolton's purchase order, vendor invoice, general ledger, and correspondence records has been conducted to determine what use of the Site by Karolton occurred during the period from January 1, 1965 to the present. (No complete records are available for years prior to 1978). Interviews have also been conducted with Kimberly-Clark personnel responsible for Karolton's waste disposal and environmental compliance activities during the period from 1965 to the present.

Based on a review of the available records, Karolton used the services of Industrial Waste Disposal Company from approximately July 1973 through approximately September 1985 to empty Karolton's trash bins and compactors and dispose of the contents. To the best of our knowledge, all of the materials disposed of were non-hazardous. The vast majority of materials disposed of consisted of non-hazardous waste papers and corrugate.

¹In submitting its response, Kimberly-Clark does not waive any rights the Corporation may have to challenge actions taken by EPA or any other party with respect to the Site. Kimberly-Clark further expressly denies that any of its disposal activities involving the Site have violated applicable provisions of Federal, state or local law.

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Interviews with Karolton employees responsible for waste disposal and environmental compliance indicate that small quantities of alcohol wastes were also deposited from time to time in Karolton trash bins and compactors. The alcohols involved were similar to ordinary rubbing alcohol and might have been considered hazardous only because they would be flammable if handled improperly. The small quantities involved were first absorbed on inert material which was then deposited in trash bins and compactors. Any residual alcohol would have evaporated within a short time, making the combined waste non-hazardous. This procedure was reviewed and found acceptable by the Ohio EPA.

None of the Karolton records indicate where Industrial Waste Disposal Company disposed of Karolton's wastes.

In sum, the records and other information available to Karolton indicate that only non-hazardous substances were disposed of through Industrial Waste Disposal Company. We accordingly conclude that, with respect to the Moraine Site, Karolton should not be considered a potentially responsible party within the meaning of the Comprehensive Environmental Response, Compensation and Liability Act, as amended.

We would appreciate EPA's sending us copies of any information the Agency has concerning any waste shipments from Karolton facilities to the Site.

If you have any questions about this matter, please contact either of the following:

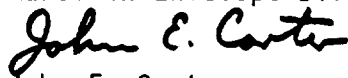
Wayne White
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Very truly yours,

KIMBERLY-CLARK CORPORATION
Karolton Envelope Division


John E. Carter
President